

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10330 JLT
)	
REUBEN LAMONT LACEFIELD)	
)	

Assented-To Motion for Continuance

_____Defendant Reuben Lacefield, by and through his undersigned attorney, hereby moves this Court for a continuance of the status hearing that is set in this case for Monday, August 1, 2005 at 3:30 to a date in late August, 2005. The defendant requests a continuance for the following reasons:

1. Mr. Lacefield is charged with two bank robberies in this Court and is also charged with seven robberies in Suffolk Superior Court. He is presently in the custody of the Sheriff of Suffolk County on the state cases.

2. Counsel anticipates that this case will be a plea. She has been regularly conferring with Mr. Lacefield's state public defender to try to coordinate the disposition of Mr. Lacefield's state and federal cases. It seems that the state prosecutor is amenable to coordinating the disposition of the cases, as is the federal prosecutor, Assistant United States Attorney Paul Moore.

3. On information and belief it appears to counsel that this defendant may have a major mental illness. Counsel has retained an expert to examine Mr. Lacefield and has provided this expert with records concerning Mr. Lacefield's psychiatric history. That expert has not yet completed her examination of Mr. Lacefield but expects to do so within the next three weeks.

4. In addition, on the afternoon of August 1, defense counsel has a pre-trial conference in a multi-defendant case scheduled at 2:00 before Judge O'Toole and a change of plea scheduled before Judge Lindsay at 3:00. Counsel has been informed that if the change of plea hearing were to be postponed, it would have to be rescheduled for late September.

5. The government, through Assistant United States Attorney Paul Moore, assents to this request. The government and defendant request the Court to order a period of excludable delay under 18 U.S.C. § 3161(h) (8) for the period of the continuance.

REUBEN LAMONT LACEFIELD

By his attorney,

/s/ Page Kelley

Page Kelley

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Date: July 25, 2005